



NISAR LAW GROUP, P.C.

Employment Attorneys

Susan Ghim, Of Counsel

sghim@nisarlaw.com

Main: (212) 600-9534

Direct: (917) 549-4708

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MEMO ENDORSED

March 4, 2021

Via ECF

Hon. Valerie E. Caproni
United States District Court Judge
United States District Court, SDNY
40 Foley Square, Room 240
New York, NY 10007

Re: Benito Hernandez Fernandez v. City Sandwich NYC, LLC et al., 2020 cv 8414 (VEC)
Request for extension of time to file an Answer

Dear Judge Caproni:

I am of counsel to the Nisar Law Group, PC, attorneys for all named Defendants, City Sandwich NYC, LLC, Eat Good Feel Good Inc., Karima Zizoune and Adam Doe, whose name is Adam Elfassi (collectively, "Defendants") in the above entitled action. I write to request an extension of time to Answer the Complaint as the firm was recently retained on or about March 3, 2020.

An Answer to the Complaint was due on or about February 10, 2021. No previous request for an adjournment was made. Opposing Counsel Gennadiy Naydensky of Michael Faillace & Associates, PC consented by email dated March 3, 2020 to a fourteen day extension of time for Defendants to Answer the Complaint on or about March 19, 2021. Accordingly, Defendants will waive service of process defenses in their Answer. Due to the client's engagement of this law firm on or about March 3, 2021 which was past the Answer due date, a request 48 hours prior to the original due date was not possible.

Defendants respectfully request that this extension of time to Answer the Complaint be granted.

Respectfully submitted,

/s/ Susan Ghim

Susan Ghim, Of Counsel

cc: Gennadiy Naydensky, Esq.
Michael Faillace & Associates, PC
Attorneys for Plaintiff

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Pursuant to this Court's participation in this district's FLSA Pilot Program, now that Defendants have appeared in this action, this case will be referred to mediation under Local Civil Rule 83.9. Defendants' time to respond to the complaint is stayed until 30 days after the conclusion of all mediation in this case.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

3/4/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE